

Exhibit A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ADAM SARR, *on behalf of herself,
FLSA Collective Plaintiffs, and the Class,*

Plaintiff,

v.

SINERGIA, INC., and
DONALD LASH,

Defendants.

Case No.: 22-cv-03610

**NOTICE OF PENDENCY
OF LAWSUIT
REGARDING WAGES**

Please read this notice if you are or were employed by SINERGIA, INC. as direct support professionals, home attendants, home care agents, at any time between May 4, 2016, and the present.

Former employee ADAM SARR (“Plaintiff”) have sued SINERGIA, INC., and DONALD LASH (collectively, “Defendants”), seeking : (1) unpaid travel time; (2) unpaid wages, including overtime, due to time shaving; (3) liquidated damages; and (4) attorneys’ fees and costs, in violation of the federal Fair Labor Standards Act (“FLSA”).¹

The purpose of this Notice is to advise you of your right to participate in this lawsuit under the FLSA. This Notice applies only to the FLSA collective action claims, not to the class action claim brought under the NYLL.

Defendants deny that Plaintiff’s claims have merit. The Court has not decided the merits of any claims or any defenses asserted by any party to this lawsuit or whether any party is right or wrong.

YOUR LEGAL RIGHTS

If you worked for Defendants as an employee at any time between May 4, 2016 and the present and believe that you may be able to assert any of the claims described above, you have the right to participate in this lawsuit. It is your right to join or not to join this lawsuit. If you decide to join this lawsuit, it is illegal for Defendants to retaliate, discharge, take any adverse action, or discriminate against you in any way for participating in this lawsuit.

¹ The lawsuit also includes class action claims under the New York Labor Law (“NYLL”) for unpaid wages, including (1) unpaid travel time; (2) unpaid wages, including overtime, due to time shaving; (3) statutory penalties; (4) liquidated damages; and (5) attorneys’ fees and costs. This Notice applies only to the FLSA claim, not to the class action claim brought under the NYLL.

If you participate in this lawsuit's FLSA claims, you will be required to provide information and answer questions, and you may be required to testify at a deposition and in court and to produce documents. You will also be bound by the outcome of this lawsuit's FLSA claims, whether it is favorable or unfavorable to the plaintiffs.

To join this lawsuit, you must sign a "Consent to Sue" form, which is enclosed with this Notice, and send it on or before **[90 days from the date notice is sent out]**:

C. K. Lee, Esq.
Lee Litigation Group, PLLC
148 West 24th Street, 8th Floor
New York, NY 10011
Tel: (212) 465-1180
Fax: (212) 465-1181
Email: ckle@leelitigation.com

If you do not join this lawsuit, and instead intend to bring your own lawsuit, you should be aware that the lawsuit must be brought within a specific period of time. Generally, the statute of limitations under the FLSA is two or three years from the date of the violation, and the statute of limitations under the NYLL is six years from the date of the violation.

THE LAWYERS REPRESENTING PLAINTIFF

If you join this lawsuit and agree to be represented by Plaintiff through her attorneys, you will be represented by Lee Litigation Group, PLLC. The firm is handling the lawsuit on a "contingency fee" basis, which means that you do not have to pay any attorneys' fees or expenses for this lawsuit. If Plaintiff wins a favorable judgment, Lee Litigation Group, PLLC may ask the Court to award it up to one-third of the monetary recovery. You are not required to have Lee Litigation Group, PLLC represent you. If you want your own attorney to represent you in this lawsuit, however, you will be responsible for paying that attorneys' fees and expenses.

GETTING MORE INFORMATION

You can obtain more information about this lawsuit by contacting C.K. Lee, Esq.:

C. K. Lee, Esq.
Lee Litigation Group, PLLC
148 West 24th Street, 8th Floor
New York, NY 10011
Tel: (212) 465-1180
Fax: (212) 465-1181
Email: ckle@leelitigation.com

Do not call or write the Court or the Clerk's Office with questions.

Dated: New York, New York, _____, 2022.

"CONSENT TO SUE" FORM

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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Defendants.

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"CONSENT TO SUE" FORM

If you are or were employed as direct support professionals, home attendants, home care agents by Defendants at any time between May 4, 2016 and the present, complete and mail this "Consent to Sue" Form by [90 days from the date of notice] to:

C. K. Lee, Esq.
Lee Litigation Group, PLLC
148 West 24th Street, 8th Floor
New York, NY 10011
Tel: (212) 465-1180
Fax: (212) 465-1181

I hereby consent to join this lawsuit as a party plaintiff. By signing and returning this consent form, I hereby designate Lee Litigation Group, PLLC to represent me and make decisions on my behalf concerning the litigation and any settlement.

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Telephone Number: _____ Social Security No.: _____

E-mail Address: _____

SIGNATURE: _____ Date: _____